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14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE DISTRICT OF NEVADA**

16 BRUCE WOLFE, as Litigation
17 Guardian Ad Litem for C.A.R., D.O.B.:
18 1/19/2002,
19 C.J.R., D.O.B.: 1/17/2005 and
20 G.Y.R., D.O.B: 10/7/2006

21 Plaintiffs,

22 v.

23 CLARK COUNTY, THE STATE OF
NEVADA DEPARTMENT OF
HEALTH AND HUMAN SERVICES,
NEVADA DIVISION OF CHILDREN
AND FAMILY SERVICES AND
JOHN AND JANE DOE 1-10.

Defendants.

No. 2:17-cv-02084-JCM-NJK

PLAINTIFFS' MOTION TO
EXTEND THE DEADLINE TO
AMEND PLEADINGS AND ADD
PARTIES

THIRD REQUESTED EXTENSION

PLAINTIFFS' MOTION TO EXTEND THE
DEADLINE TO AMEND PLEADINGS AND
ADD PARTIES THIRD REQUESTED EXTENSION - 1

1 Plaintiffs move the Court for an order extending the deadline for adding
2 parties and amending the pleadings.

3 On December 14, 2017 the parties presented a stipulation to this Court asking
4 the Court to extend all deadlines for 120 days. That motion was granted in part,
5 however, because the deadline for moving to amend or add parties had passed the
6 court denied that part of the motion without prejudice. Docket No. 46.

7 On December 20, 2017 Plaintiffs moved for a second order extending the
8 deadlines for moving to adding the parties and amending the pleadings. Docket No.
9 48.

10 On December 21, 2017 the Court granted Plaintiffs' motion to extend the
11 deadline to amend pleadings and ordered that the Plaintiffs add or amended the
12 complaint no later than January 31, 2018. Docket No. 49.

13 Since the second request for extension was filed, Clark County has produced
14 an excess of 2,500 pages of records contained in 64 exhibits. See Ressler
15 Declaration.

16 Plaintiffs' counsel has reviewed the records and they have been able to
17 identify several Clark County agents and employees whom they believe could be
18 added as defendants to this complaint.

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PLAINTIFFS' MOTION TO EXTEND THE
DEADLINE TO AMEND PLEADINGS AND
ADD PARTIES THIRD REQUESTED EXTENSION - 2

1 Defendants have failed to produce documents and records relating to the
2 ICPC request to the State of Oregon and Oregon's responses to that request.

3 Defendants claimed that the State of Nevada has control of these records
4 since they managed them. Additionally, Defendants recently advised that they
5 located in excess of 1,000 pages of additional records relating to the ICPC. They
6 advised that they were reviewing and redacting those records as necessary. They
7 also advised that these records would be produced shortly. See **Exhibit 1** to Ressler
8 Declaration.
9

10 Because Defendant Clark County failed to produce the ICPC records,
11 Plaintiffs have issued a Subpoena to the state of Nevada requesting the complete
12 ICPC file.
13

14 Plaintiffs also asked the Defendant Clark County to produce the dependency
15 file for the three children transferred to the state of Oregon. The Defendants claim
16 that they did not have the entire dependency file and that those records were in the
17 exclusive control of the Juvenile Court. See **Exhibit 2** to Ressler Declaration.
18

19 Plaintiffs have issued a Subpoena to the Clark County Juvenile Family Court
20 and requested that they produce the entire dependency file.

21 Plaintiffs would like the opportunity to review the entire ICPC file as well as
22 the entire dependency file before they make a final determination of who to add as
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PLAINTIFFS' MOTION TO EXTEND THE
DEADLINE TO AMEND PLEADINGS AND
ADD PARTIES THIRD REQUESTED EXTENSION - 3

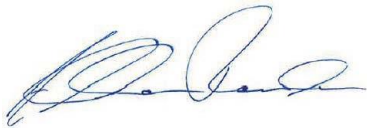
1 additional defendants and what other amendment to the pleadings may be
2 necessary.

3 Wherefore, Plaintiffs request that the Court authorize an additional 30 days
4 to allow Plaintiffs to amend and / or add additional parties.
5

6 Respectfully submitted this 19th day of January, 2018.

7 **RESSLER & TESH, PLLC**

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14 NO FURTHER EXTENSIONS WILL BE GRANTED

15 IT IS SO ORDERED.

16 Dated: January 22, 2018

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19 _____
UNITED STATES MAGISTRATE JUDGE
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PLAINTIFFS' MOTION TO EXTEND THE
DEADLINE TO AMEND PLEADINGS AND
ADD PARTIES THIRD REQUESTED EXTENSION - 4